

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

UNITED STATES OF AMERICA

v.

SOLOMON MARSHALL

CASE NUMBER: 24 CR 135

FILED
3/13/2024
THOMAS G. BRUTON
CLERK, U.S. DISTRICT COURT**CRIMINAL COMPLAINT**

I, the complainant in this case, state that the following is true to the best of my knowledge and belief. On or about March 12, 2024, at Chicago, in the Northern District of Illinois, Eastern Division, the defendant violated:

*Code Section*Title 18, United States Code, Section
2113(a)*Offense Description*

Defendant did, by intimidation, take from the person and presence of bank employees approximately \$776 in United States currency belonging to, and in the care, custody, control, management, and possession of Fifth Third Bank, located at 1 South Wacker Drive, Chicago, Illinois 60606, the deposits of which were then insured by the Federal Deposit Insurance Corporation

This criminal complaint is based upon these facts:

X Continued on the attached sheet.

Cameron Gordon

CAMERON GORDON

Special Agent, Federal Bureau of Investigation
(FBI)

Pursuant to Fed. R. Crim. P. 4.1, this Complaint is presented by reliable electronic means. The above-named agent provided a sworn statement attesting to the truth of the Complaint and Affidavit by telephone.

Date: March 13, 2024
Judge's signatureCity and state: Chicago, IllinoisGABRIEL A. FUENTES, U.S. Magistrate Judge

Printed name and title

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS

AFFIDAVIT

I, CAMERON GORDON, being duly sworn, state as follows:

Background of Affiant

1. I am a Special Agent with the Federal Bureau of Investigation (“FBI”) and have been so employed for over two years. My current responsibilities include the investigation of violent crimes, including, among others, kidnaping, bank robbery, and the apprehension of violent fugitives.

Basis and Purpose of Affidavit

2. This affidavit is submitted in support of a criminal complaint alleging that SOLOMON MARSHALL has violated Title 18, United States Code, Section 2113(a). Because this affidavit is being submitted for the limited purpose of establishing probable cause in support of a criminal complaint charging MARSHALL with bank robbery, I have not included each and every fact known to me concerning this investigation. I have set forth only the facts that I believe are necessary to establish probable cause to believe that the defendant committed the offense alleged in the complaint.

3. This affidavit is based upon my personal knowledge, information provided to me by other law enforcement agents, conversations I have had with other law enforcement personnel who have knowledge of the events and circumstances described herein, interviews of witnesses, and review of video and photographs.

Summary of Facts Supporting Probable Cause

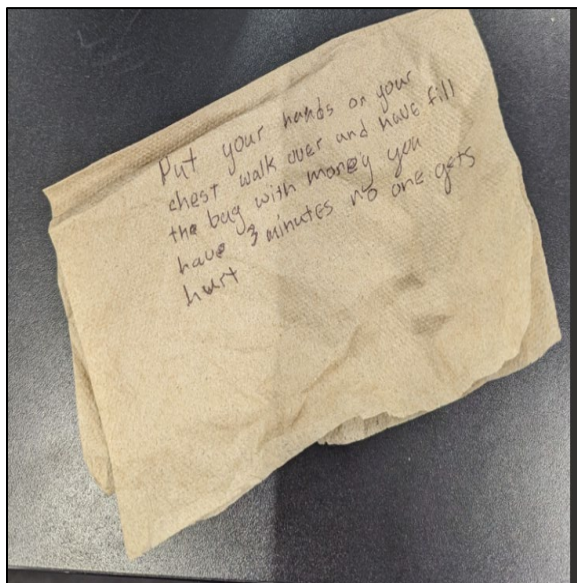
4. As outlined below, on or about March 12, 2024, at approximately 9:41 a.m., a man robbed the Fifth Third Bank located at 1 South Wacker Drive in Chicago, Illinois (the “Fifth Third Bank”), using a handwritten demand note. Immediately after the robbery, surveillance footage from the Chicago Transit Authority (“CTA”) station at Washington and Wells captured the robber entering the elevated station and boarding a train. Additional CTA footage at the Clark and Lake station captured the robber transfer to a Blue Line train heading in the direction of Forest Park. Responding law enforcement officers intercepted the Blue Line train at or about the Illinois Medical District station and arrested the robber, who identified himself as SOLOMON MARSHALL.

Robbery of the Fifth Third Bank

5. According to surveillance footage from the Fifth Third Bank, on March 12, 2024, at approximately 9:41 a.m., a black male entered the Fifth Third Bank located at 1 South Wacker Drive in Chicago, Illinois, and approached the teller counter. The robber wore a mask, a gray jacket with dark clothes underneath, gray hat, white shoes, black and red gloves, and carried a brown paper bag. A screenshot from the Fifth Third Bank surveillance footage depicting the robber is shown below.

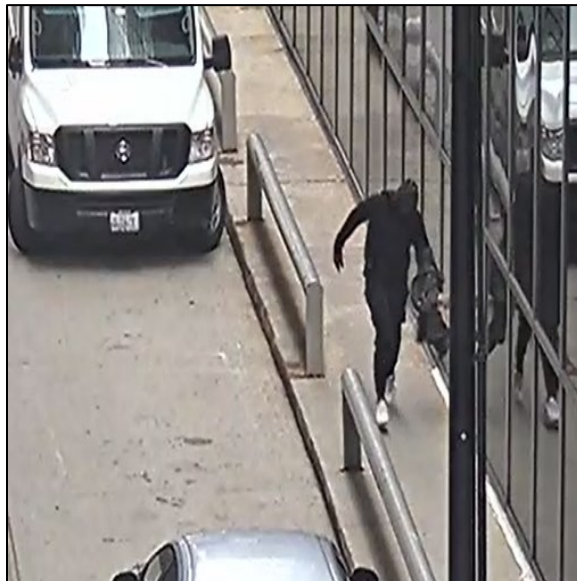


6. According to Victim Teller 1, the male attempted to present a note to a bank teller working behind the teller counter ("Victim Teller 1"). Another bank teller ("Victim Teller 2") was standing near Victim Teller 1 when the male presented the note to Victim Teller 2, who took it. The note, which was later recovered by law enforcement and is pictured below, read, "Put your hands on your chest walk over and have [sic] fill the bag with money you have 3 minutes no one gets hurt."



7. According to Victim Teller 2, s/he took the note and walked over to his/her teller station and retrieved cash. Victim Teller 2 then handed the money to the robber. According to Victim Teller 1, the robber then exited the Fifth Third Bank and walked south on South Wacker Drive. Victim Teller 2 described the robber as a young black male, medium complexion, gray scarf covering most of his face, dark colored wind breaker jacket, dark colored pants, holding a brown paper bag.

8. Surveillance footage from the exterior of a business abutting West Arcade Place, which runs perpendicular to South Wacker Drive immediately south of the Fifth Third Bank, captured the robber—wearing the same gray jacket with dark clothes underneath, gray hat, white shoes, black and red gloves, and carrying a brown paper bag—walking eastbound on West Arcade Place at approximately 9:43 a.m. The footage further captured the robber removing his gray jacket, as depicted in the below screenshot, leaving him wearing a dark zip-up jacket, as seen in greater detail in still images discussed below.



9. Additional surveillance footage from the business on West Arcade place captured what appears to be U.S. currency falling out of the robber's brown paper bag and onto the ground. The footage further shows the robber pick up the cash and place it back inside the bag.



10. The surveillance footage also captured the robber remove his mask, gray hat, and red and black gloves, and place them into the brown paper bag, as shown in the below photographs.



11. At approximately 9:47 a.m., surveillance footage from the CTA station at Washington and Wells, located approximately two blocks east and one block north of the Fifth Third Bank, captured the robber walking up the stairs to the elevated train station. Below is a still photograph of the robber entering the station:



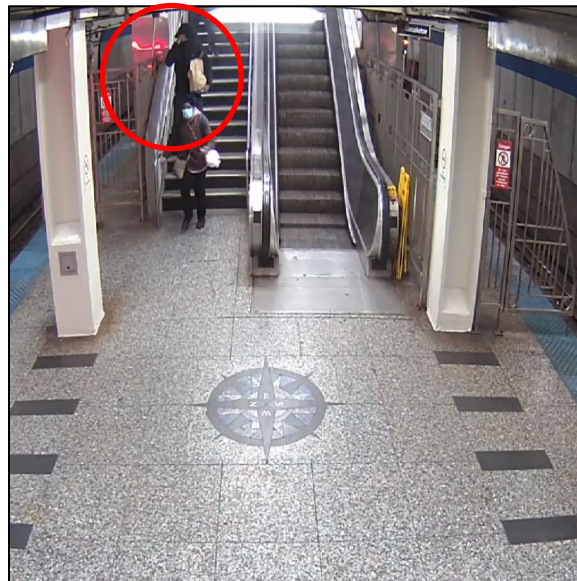
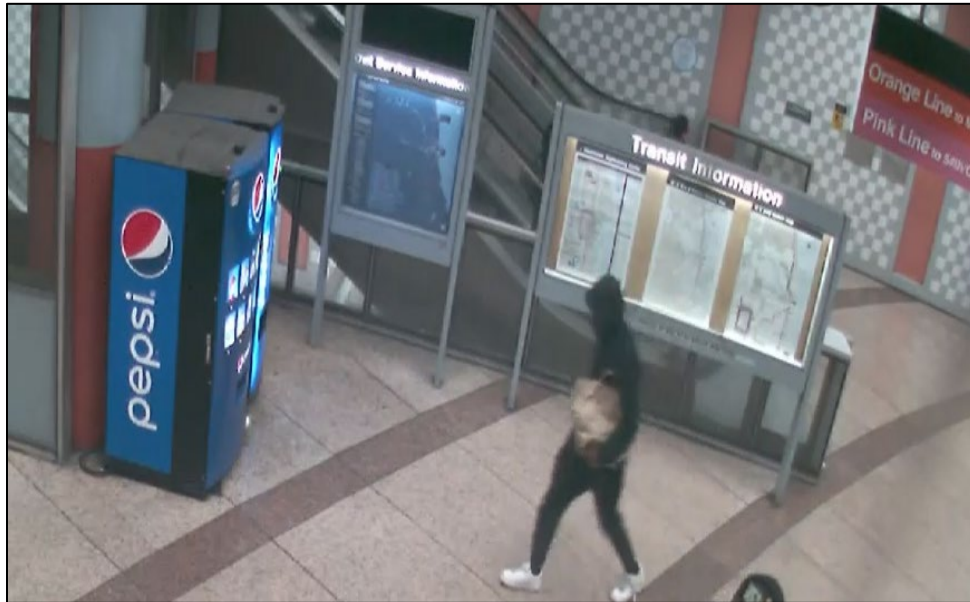
12. At approximately 9:47 a.m., CTA surveillance footage captured the robber step over the turnstile to enter the train platform and get onto a CTA Train #2910 as shown below:



13. According to CTA surveillance footage and the CTA, at approximately 9:50 a.m., Train #2910 arrived at the Clark and Lake station and the robber exited the train still carrying his brown paper bag, as shown below:



14. According to CTA surveillance footage, at approximately 9:51 a.m., the robber traveled downstairs and entered the underground CTA Blue Line, as shown below:

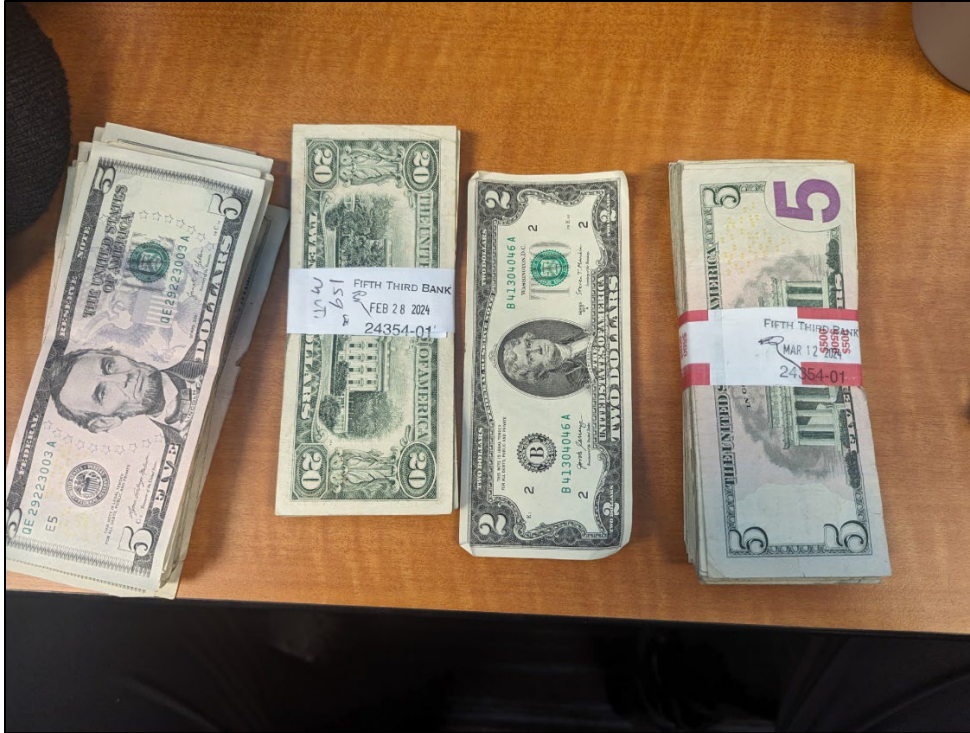


15. According to CTA surveillance footage, at approximately 9:53 a.m., the robber boarded CTA Blue Line Train #3165 heading in the direction of Forest Park, as shown below:



16. Law enforcement officers were monitoring CTA's surveillance cameras following the Fifth Third Bank robbery and responded to the CTA Blue Line Illinois Medical District station. According to CTA surveillance footage, at approximately 10:07 a.m., Chicago Police Department ("CPD") officers arrested defendant on CTA Train #3165 when it stopped at the Illinois Medical District station.

17. The robber's brown paper bag was still in his possession at the time of his arrest. Officers searched the brown bag and recovered a gray jacket, gray hat, black face mask, black and red gloves, and \$776.00. Some of the U.S. currency had paper strips around it with the marking "Fifth Third Bank," as shown below:



18. According to an audit performed by Fifth Third Bank, the robber who robbed the bank on March 12, 2024, took approximately \$776.00. Fifth Third Bank personnel confirmed that the deposits of the Fifth Third Bank were insured by the Federal Deposit Insurance Corporation at the time of the robbery.

19. Upon arrest, the robber provided his name as “Solomon Marshall” and his date of birth. Officers obtained the below photograph for SOLOMON MARSHALL from law enforcement databases, which, based upon my review, matches the appearance the robber captured on the CTA video surveillance footage described above:



20. CPD officers brought MARSHALL to the Fifth Third Bank and conducted a show-up with Victim Teller 2, who positively identified MARSHALL as the person who robbed the bank that day.

Conclusion

21. Based upon the foregoing facts, I respectfully submit that there is probable cause to believe that, on or about March 12, 2024, SOLOMON MARSHALL did, by intimidation, take from the person and presence of bank employees approximately \$776 in United States currency belonging to, and in the care, custody, control, management, and possession of the Fifth Third Bank, located at 1 South Wacker Drive, Chicago, Illinois, the deposits of which were then insured by the Federal Deposit Insurance Corporation, in violation of Title 18, United States Code, Section 2113(a).

FURTHER AFFIANT SAYETH NOT.

Cameron Gordon

CAMERON GORDON

Special Agent, Federal Bureau of
Investigation

SWORN TO AND AFFIRMED by telephone March 13, 2024.



Honorable GABRIEL A. FUENTES
United States Magistrate Judge